

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

**CERTIFICATION OF  
GREGORY E. OSTFELD,  
ESQ.**

GREGORY E. OSTFELD, ESQ., being of full age, certifies as follows:

1. I am a Shareholder at Greenberg Traurig, LLP, and serve as an attorney for Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceuticals Industries Ltd., Actavis Pharma, Inc., and Actavis LLC. I make this Certification based on personal knowledge and in support of the TPP Trial Defendants'<sup>1</sup> Joint Motion to Compel Production of Documents and Data Relevant to Plaintiff's Alleged Damages and to Set Deadlines for Damages Experts.

2. Attached hereto as Exhibit A is a true and accurate copy of excerpts of the deposition of Christopher Miranda, Esq., taken on April 29, 2021, in MDL 2875. This document has been filed under seal because it contains information that has

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<sup>1</sup> Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai US Inc., Princeton Pharmaceutical Inc. d/b/a Solco Healthcare LLC, Solco Healthcare US, LLC, Teva Pharmaceuticals USA, Inc., Actavis Pharma, Inc., Actavis, LLC, and Torrent Pharma Inc.

been designated as “PROTECTED INFORMATION” as defined in the applicable Amended Confidentiality and Protective Order [[Dkt. 1661](#)].

3. Attached hereto as Exhibit B is a true and accurate copy of Exhibit 2 to the deposition of Jorge Lopez, Esq., taken on April 29, 2021, in MDL 2875. This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the applicable Amended Confidentiality and Protective Order [[Dkt. 1661](#)].

4. Pursuant to Rule 37(a)(1) of the Federal Rules of Civil Procedure, the undersigned hereby certifies that counsel has conferred in good faith in an attempt to resolve the discovery dispute prior to seeking intervention from the Court.

Dated: October 20, 2022

By: /s/ Gregory E. Ostfeld  
Gregory E. Ostfeld

GREENBERG TRAURIG, LLP  
77 West Wacker Drive, Suite 3100  
Chicago, Illinois 60601  
Tel: (312) 456-8400  
[ostfeldg@gtlaw.com](mailto:ostfeldg@gtlaw.com)

*Attorneys for Teva Pharmaceuticals  
USA, Inc., Teva Pharmaceutical  
Industries Ltd., Actavis LLC, and Actavis  
Pharma, Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 20, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Gregory E. Ostfeld  
Gregory E. Ostfeld